

FILED - GR
 August 28, 2012 10:47 AM

In the United States District Court
 For the Western District of Michigan
Bradley Keith Sleighter
#46848

TRACEY CORDES CLERK
 U.S. DISTRICT COURT
 WESTERN DISTRICT OF MICHIGAN
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1:12-cv-910

Janet T. Neff
 U.S. District Judge
 Ellen S. Carmody
 U.S. Magistrate Judge

(Enter above the full names of all plaintiffs, including prisoner number, in this action.)

v. Kent County Jail Administration
Corizon Medical Services

(Enter above the full name of the defendant or defendants in this action.)

COMPLAINT

I. Previous Lawsuits

CAUTION: The Prison Litigation Reform Act has resulted in substantial changes in the ability of incarcerated individuals to initiate lawsuits in this and other federal courts without prepayment of the required \$350 filing fee. Accurate and complete responses are required concerning your litigation history. Generally, a plaintiff's failure to accurately and completely answer the questions set forth below will result in denial of the privilege of proceeding *in forma pauperis* and require you to pay the entire \$350 filing fee regardless whether your complaint is dismissed.

- A. Have you ever filed a lawsuit while incarcerated or detained in any prison or jail facility? Yes No
- B. If your answer to question A was yes, for each lawsuit you have filed you must answer questions 1 through 5 below. Attach additional sheets as necessary to answer questions 1 through 5 below with regard to each lawsuit.

1. Identify the court in which the lawsuit was filed. If it was a state court, identify the county in which the suit was filed. If the lawsuit was filed in federal court, identify the district within which the lawsuit was filed.

U.S. District Court for Western District of Michigan

2. Is the action still pending? Yes No

a. If your answer was no, state precisely how the action was resolved: _____

3. Did you appeal the decision? Yes No

4. Is the appeal still pending? Yes No

a. If not pending, what was the decision on appeal? _____

5. Was the previous lawsuit based upon the same or similar facts asserted in this lawsuit? Yes No

If so, explain: _____

II. Place of Present Confinement

If the place of present confinement is not the place you were confined when occurrence that is subject of instant lawsuit arose, also list the place you were confined: _____

III. Parties

A. Plaintiff(s)

Place your name in the first blank and your present address in the second blank. Provide the same information for any additional plaintiffs. Attach extra sheets as necessary.

Name of Plaintiff Bradley Keith Sleighter #46848
 Address 703 Ball Ave. N.E. Grand Rapids, MI 49503

B. Defendant(s)

Complete the information requested below for each defendant in this action, including whether you are suing each defendant in an official and/or personal capacity. If there are more than four defendants, provide the same information for each additional defendant. Attach extra sheets as necessary.

Name of Defendant #1 Kent County Correctional Facility Administration
 Position or Title Administrator

Place of Employment _____
 Address 701 Ball Ave. N.E. Grand Rapids, MI 49503

Official and/or personal capacity? _____
 Name of Defendant #2 Corizon Medical Services

Position or Title _____
 Place of Employment Kent County Correctional Facility

Address 703 Ball Ave. N.E. Grand Rapids, MI 49503
 Official and/or personal capacity? Healthcare provider for inmates

Name of Defendant #3 _____

Position or Title _____

Place of Employment _____

Address _____

Official and/or personal capacity? _____

Name of Defendant #4 _____

Position or Title _____

Place of Employment _____

Address _____

Official and/or personal capacity? _____

Name of Defendant #5 _____

Position or Title _____

Place of Employment _____

Address _____

Official and/or personal capacity? _____

IV. Statement of Claim

State here, as briefly as possible, the facts of your case. Describe how each defendant is personally involved. Include also, the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets if necessary.

On 7-24-12 I filed a complaint with this court against the Kent County Jail Administration for failure to provide me with a Jewish Kosher Diet.

On 7-27-12 the Grand Rapids Press printed an article about my legal complaint and notified the Kent County Jail Administrator Jon Hess of my legal actions against the jail.

On 8-7-12 I'd sought medical treatment for health issues related to excessive weight loss from Corizon employee Dr. Sova (D.O.). Dr. Sova ordered me a high-protein no meat diet to address my weight loss and deteriorating health condition. When I had not received the prescribed diet that Dr. Sova ordered I spoke with him on 8-10-12 and he said that the Kent County Jail Administration would not allow me to have the diet and blocked his order for the diet.

I believe that Corizon Medical Services has conspired with the Kent County Jail Administration to deprive me of medical treatment in retaliation for filing a legal complaint against the administration. I also believe that Corizon Medical Services was complacent in not challenging the Kent County Jail Administration when they interfered with my medical treatment ordered by Dr. Sova thus depriving me of medical treatment protected under the law. I believe their actions to be malicious and retaliatory in nature as well as negligent and an outright violation of my right to receive medical treatment protected by prior presideded litigation. *(next page)

V. **Relief**

State briefly and precisely what you want the court to do for you.

I seek punitive action against Kent County Jail Administration and Corizon Medical Services as well as damages for not treating my health needs.

*It should be noted that this complaint implies no culpability on the part of Dr. Sova.

8-17-2012

Date

Bradley Keith Wrighton

Signature of Plaintiff

NOTICE TO PLAINTIFF(S)

The failure of a *pro se* litigant to keep the court apprised of an address change may be considered cause for dismissal.